



May 11, 2015

Mr. Guy Benjamin  
CEO  
Hawaii Medical College  
1221 Kapiolani Boulevard  
Honolulu, HI 96814-3518

Certified Mail  
Return Receipt Requested  
#: 70070710000106743971

RE: **Hawaii Medical College**  
**Final Program Review Determination**  
OPE ID: 04182200  
PRCN: 201220927969

Dear Mr. Benjamin:

The U.S. Department of Education's (Department's) San Francisco/Seattle School Participation Division issued a program review report on July 25, 2012 covering the Hawaii Medical College's (HMC's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2007-08 and 2008-09 award years. HMC's final response is dated February 4, 2014. A copy of the program review report (and related attachments) and HMC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by HMC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

**Purpose:**

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal, and (4) close the review.

Liabilities totaling \$2,653 have been repaid by HMC. No further action is required.

**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter and the attached report, please contact Lana Walter at (206) 615-3690.

Sincerely,



Martina Fernandez-Rosario  
Division Director  
San Francisco/Seattle School Participation Division

Enclosure:  
Final Program Review Determination

cc: Mrs. Elizabeth M. Santa Maria, Financial Aid Administrator  
Accrediting Council for Continuing Education & Training  
HI Department of Education, Community Education Section  
Department of Defense ([osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil](mailto:osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil))  
Department of Veterans Affairs ([INCOMING.VBAVACO@va.gov](mailto:INCOMING.VBAVACO@va.gov))  
Consumer Financial Protection Bureau ([CFPB\\_ENF\\_Students@cfpb.gov](mailto:CFPB_ENF_Students@cfpb.gov))

Prepared for

**Federal Student Aid**  
An OFFICE of the U.S. DEPARTMENT of EDUCATION

**Hawaii Medical College**

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**OPE ID:** 04182200

**PRCN:** 201220927969

Prepared by:  
U.S. Department of Education  
Federal Student Aid  
San Francisco/Seattle School Participation Division

## **Final Program Review Determination**

### **May 11, 2015**

50 Beale Street, Suite 9800  
San Francisco, CA 94105  
[StudentAid.ed.gov](http://StudentAid.ed.gov)

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**A. Institutional Information**

Hawaii Medical College  
1221 Kapiolani Boulevard  
Honolulu, HI 96814-3518

Type: Proprietary

Highest Level of Offering: Non-degree 1 Year

Accrediting Agency: Accrediting Council for Continuing Education & Training

Current Student Enrollment: 230 (2010-2011)

% of Students Receiving Title IV: 71.2% (2010-2011)

Title IV Participation (per National Student Loan Data System records):

	<u>2010-2011</u>
Federal Pell Grant Program (Pell)	\$346,222
Federal Direct Loan Program (DL)	\$316,747

Default Rate FFEL/DL: 2011 0%



## **B. Scope of the Review**

The U.S. Department of Education (the Department) conducted a program review at Hawaii Medical College (HMC) from March 28, 2012 to June 8, 2012. The review was conducted by Lana Walter, DeNise L. McMillian, and Julie Arthur.

The focus of the review was to evaluate HMC's compliance with the statutes and federal regulations as they pertain to the institution's administration of the Title IV programs. The review consisted of an examination of HMC's academic records, student account ledgers and financial aid files for the academic years 2010-2011 and 2011-2012.

A sample of files was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review. A program review report (PRR) was issued on July 25, 2012.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning HMC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve HMC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

## **C. Findings and Final Determinations**

### **Resolved Findings:**

HMC has taken the corrective actions necessary to resolve finding # 1 of the PRR. Therefore, this finding may be considered closed. (Appendix B contains a copy of the PRR and Appendix C contains HMC's response to the PRR). The final determinations with respect to the program violations identified in the remaining findings are discussed below.

### **Findings with Final Determinations:**

The PRR findings requiring further action are summarized below. At the conclusion of each finding is a summary of HMC's response to the finding, and the Department's final determination for that finding.

## **Finding #2. Incorrect Federal Pell Grant Calculations**

**Citation Summary:** *Per 34 C.F.R. § 690.62(a), the amount of a student's Pell Grant for an academic year is based upon the payment and disbursement schedules published by the Secretary for each award year. The federal Pell Grant for a payment period for a student in a program using credit hours without terms is calculated, according to 34 C.F.R. § 690.63(e) by (a) determining the student's Scheduled Pell Grant using the Payment Schedule; (b) multiplying the amount determined under paragraph(e)(1) of this section by the lesser of (i) the number of credit hours in the payment period/the number of credit hours in a program's academic year or (ii) the number of weeks of instructional time in the payment periods/the number of weeks of instructional time in the program's academic program. More specific instructions and examples may be found in the the Federal Student Aid Handbook, Volume 3, Chapter 3.*

**Noncompliance Summary:** *HMC's accreditor approved HMC to measure its programs using quarter credit hours. Julie Arthur, Institutional Improvement Specialist, conducted a new school visit of HMC April 20-21, 2011. During that onsite visit, Ms. Arthur advised HMC that it was incorrectly calculating its students' Pell Grant awards, because it was improperly using clock hours in its calculations. HMC was incorrectly converting its credit hours to clock hours and then using the clock hours in its Pell Grant calculations. Ms. Arthur informed HMC that it was required to correct its students' Pell Grant calculations using the non-term credit hour calculation formula.*

*During the off-site program review, the reviewers determined that HMC had failed to correct its Pell Grant calculations and that it had continued to incorrectly calculate its students' Pell Grant Awards.*

*HMC did not accurately calculate Pell Grant disbursements for Students #22 and #24. This resulted in an overpayment of Federal Pell Grants. Student #22 was overpaid by \$78 and Student #24 was overpaid by \$19.*

**Required Action Summary:** *In response to this finding, HMC was required to conduct a full file review of all students who received Pell Grant funds in the 2010-2011 and 2011-2012 award years to determine if the incorrect calculation of Pell Grant funds resulted in overpayments to students. In performing the file review, HMC was required to submit a report, in spreadsheet format, containing the following elements: Student Name, Last four digits of SSN, Award Year, Program, Pell amount awarded and disbursed, Pell recalculated using the correct methodology, and any change in Pell.*

**HMC's Response:** *HMC performed a full file review for 2010-2011 and 2011-2012, provided to the Department completed spreadsheets, and determined that Pell Grant funds resulted in overpayments to students. On May 1, 2013, HMC submitted documentation to the Department reflecting the refund of Pell Grant funds in the amount of \$354 for the*



2010-2011 and \$1,478 for the 2011-2012 award years. (Note: Appendix A includes the student sample for the 2010-2011 and 2011-2012 award years.)

The results of HMC's file review is summarized as follows:

	AY 2011-2012	AY 2010-2011
<b>Pell Grant Funds</b>	<b>\$1,478</b>	<b>\$354</b>

**Final Determination:** Liabilities of \$1,832 were established for this finding. However, HMC returned all the Pell Grant overpayments to the Department in the amount of \$1,832 on May 1, 2013. As a result, HMC took the corrective actions necessary to resolve this finding. Therefore, this finding may be considered closed.

### **Finding #3: Incorrect DL Calculations**

**Citation Summary:** *Per 34 C.F. R. §685.301(a), a school participating in the Direct Loan Program shall ensure that any information it provides to the Secretary in connection with loan origination is complete and accurate. Additionally, for loans originated under 34 C.F.R. § 685.301(a)(10)(i)(B), except as provided in paragraph (a)(10)(ii) or (iii), at a school that measures academic progress in clock hours, or measures academic progress in credit hours but does not use a semester, trimester, or quarter system and does not have terms that are substantially equal in length with no term less than nine weeks in length, the minimum enrollment period for which a school may certify a loan is the lesser or-(1) The length of the student's program (or the remaining portion of that program if the student has less than the full program remaining) at the school; or (2) The academic year as defined by the school in accordance with 34 C.F.R 668.3.*

**Noncompliance Summary:** *HMC's accreditor approved it to measure its programs using quarter credit hours. Julie Arthur, Institutional Improvement Specialist, conducted a new school visit of HMC April 20-21, 2011. During that onsite visit, Ms. Arthur advised HMC that it was incorrectly calculating its students' DL awards, because it was improperly using clock hours in its calculations. HMC was incorrectly converting its credit hours to clock hours and then using the clock hours in its DL calculations. Ms. Arthur informed HMC that it was required to correct its students' DL calculations using the non-term credit hour calculation formula.*

*During the off-site program review, the reviewers determined that HMC had failed to correct its DL calculations and that it had continued to incorrectly calculate its students' DL Awards.*

*HMC did not accurately calculate DL amounts for Students #6 and #8. This resulted in overpayments of DL funds. Student #6 was overpaid \$142.35 and Student #24 was overpaid \$142.35.*



**Required Action Summary:** *In response to this finding, HMC was required to conduct a full file review of all students who received Direct Loans in the 2010-2011 and 2011-2012 award years to determine if the incorrect calculation of DL amounts resulted in overpayments to students. In performing the file review, HMC was required to submit a report, in spreadsheet format, containing the following elements: Student Name, Last four digits of SSN, Award Year, Program, DL amount awarded and disbursed, DL recalculated using the correct methodology, and any change to the Direct Loan amount.*

**HMC's Response:** HMC performed a full file review for 2010-2011 and 2011-2012, provided to the Department completed spreadsheets, and determined that Direct Loans resulted in overpayments to students. On May 1, 2013, HMC submitted documentation to the Department reflecting the refund of Direct Loans in the amount of \$821 for the 2011-2012 award year. (Note: Appendix A includes the student sample for the 2010-2011 and 2011-2012 award years.)

The results of HMC's file review is summarized as follows:

	AY 2011-2012	AY 2010-2011
<b>Direct Loans</b>	<b>\$821</b>	<b>\$0</b>

**Final Determination:** The total amount of Direct Loan funds (subsidized and unsubsidized) incorrectly disbursed to students during the 2011-2012 award year is \$821. HMC returned all the ineligible Direct Loans to the Department, in the amount of \$821, on May 1, 2013. As a result, HMC took the corrective actions necessary to resolve this finding. Therefore, this finding may be considered closed.

#### **D. Summary of Liabilities**

The total amount calculated as liabilities from the findings in the program review determination is as follows. This information is provided so that the institution understands the liabilities associated with each finding. HMC has repaid all liabilities.

	Finding 2	Finding 3
<b>Pell Grant</b>	<b>\$ 1,832.00</b>	<b>\$ -</b>
<b>DL Subsidized</b>	<b>\$ -</b>	<b>\$ 378.00</b>
<b>DL Unsubsidized</b>	<b>\$ -</b>	<b>\$ 443.00</b>

Liabilities identified in this chart for Finding #2 and #3 represent Pell Grant overpayments and ineligible Direct Loan disbursements identified by HMC in its full file review.

## **Appendix B**

### **Program Review Report**



August 10, 2012

Mr. Guy Benjamin  
CEO  
Hawaii Medical College  
1221 Kapiolani Boulevard  
Honolulu, HI 96814-3518

Certified Mail  
Return Receipt Requested  
#: 7003 1680 0005 1119 5977

RE: **Program Review Report**  
OPE ID: 04182200  
PRCN: 201220927969

Dear Mr. Benjamin:

From March 28, 2012 through June 8, 2012, Lana Walter, DeNise L. Hill, and Julie Arthur conducted a review of Hawaii Medical College's (HMC's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by HMC. The response should include a brief, written narrative for each finding that clearly states HMC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, HMC must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
  - a. A written statement addressing the institution's response;
  - b. A written statement of the basis for such report or determination; and
  - c. A copy of the institution's response.

<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Federal Student Aid, San Francisco/Seattle School Participation Division  
915 Second Avenue, Suite 390, Seattle, WA 98174  
[www.FederalStudentAid.ed.gov](http://www.FederalStudentAid.ed.gov)

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The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection by HMC upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Lana Walter of this office within 60 calendar days of receipt of this letter.

**Protection of Personally Identifiable Information (PII):**

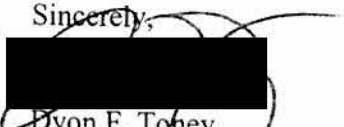
PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each of the findings references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. The appendix was encrypted and sent separately to the institution via e-mail. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Lana Walter at (206)615-3690 or [lane.walter@ed.gov](mailto:lane.walter@ed.gov).

Sincerely,

  
Byron F. Toney  
Compliance Manager

cc: Elizabeth Santa Maria, Financial Aid Administrator

Enclosure:

Protection of Personally Identifiable Information  
Program Review Report

Prepared for

**Hawaii Medical College**



START HERE  
GO FURTHER  
FEDERAL STUDENT AID

OPE ID: 04182200

PRCN: 201220927969

Prepared by

U.S. Department of Education

Federal Student Aid

San Francisco/Seattle School Participation Division

# Program Review Report

August 10, 2012

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### **A. Institutional Information**

Hawaii Medical College  
1221 Kapiolani Boulevard  
Honolulu, HI 96814-3518

Type: Proprietary

Highest Level of Offering: Non-degree 1 Year

Accrediting Agency: Accrediting Council for Continuing Education & Training

Current Student Enrollment: 230 (2010-2011)

% of Students Receiving Title IV: 71.2% (2010-2011)

Title IV Participation (per NSLDS records):

	2010-2011
Federal Pell Grant (Pell)	\$346,222
Federal Direct Loan Program (DL)	\$316,747

Default Rate FFEL/DL: Not available as of the date of this Program Review

### **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Hawaii Medical College (HMC) from March 28, 2012 to June 8, 2012. The review was conducted by Lana Walter, DeNise L. Hill, and Julie Arthur.

The focus of the review was to evaluate HMC's compliance with the statutes and federal regulations as they pertain to the institution's administration of the Title IV programs. The review consisted of an examination of HMC's academic records, student account ledgers and financial aid files for the academic years 2010-2011 and 2011-2012.

A sample of files was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

**Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning HMC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve HMC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

**C. Findings**

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by HMC to bring operations of the financial aid programs into compliance with the statutes and regulations.

**Finding 1: Failure to Delay Disbursement of FFEL/DL for Thirty Days**

**Citation:** Per 34 C.F.R. § 682.604(c)(5), a school may not release the first installment of a FFEL to a student who has not previously received a FFEL or Direct Loan until 30 days after the first day of the student's program of study unless the school has a cohort default rate of less than 10% for each of the three most recent fiscal years for which data are available. Since HMC is a relatively newly certified school, no cohort default rate is available as yet; thus, HMC would be required to delay disbursements for the required 30 days.

**Noncompliance:** Disbursements for Students #'s 4, 6, 7, 16, and 25 were not held for the requisite 30 days after the start of their program. The specific start and disbursement dates are as follows:

Student	Start of Program	DL Disbursement Date
#4	6/31/2011	7/6/2011
#6	4/4/2011	4/20/2011
#7	4/4/2011	4/20/2011
#16	10/31/2011	11/22/2011
#25	9/26/2011	10/19/2011

**Required Action:** Since the students did subsequently earn the DL disbursements, no liability is due from HMC on this finding. However, HMC must develop procedures for



the delay of disbursements for 30 days after the start of an academic program, in cases where the students have not previously had FFEL/DL student loans. HMC must submit a copy of those newly-developed procedures in response to this PRR.

### **Finding 2: Incorrect Federal Pell Grant Calculations**

**Citation:** Per 34 C.F.R. § 690.62(a), the amount of a student's Pell Grant for an academic year is based upon the payment and disbursement schedules published by the Secretary for each award year. The federal Pell Grant for a payment period for a student in a program using credit hours without terms is calculated, according to 34 C.F.R. § 690.63(e) by (a) determining the student's Scheduled Pell Grant using the Payment Schedule; (b) multiplying the amount determined under paragraph(e)(1) of this section by the lesser of (i) the number of credit hours in the payment period/the number of credit hours in the program's academic year or (ii) the number of weeks of instructional time in the payment period/the number of weeks of instructional time in the program's academic year. More specific instructions and examples may be found in the Federal Student Aid Handbook, Volume 3, Chapter 3.

**Noncompliance:** HMC's accreditor approved HMC to measure its programs using quarter credit hours. Julie Arthur, Institutional Improvement Specialist, conducted a new school visit of HMC April 20-21, 2011. During that onsite visit, Ms. Arthur advised HMC that it was incorrectly calculating its students' Pell Grant awards, because it was improperly using clock hours in its calculations. HMC was incorrectly converting its credit hours to clock hours and then using the clock hours in its Pell Grant calculations. Ms. Arthur informed HMC that it was required to correct its students' Pell Grant calculations using the non-term credit hour calculation formula.

During the off-site program review, the reviewers determined that HMC had failed to correct its Pell Grant calculations and that it had continued to incorrectly calculate its students' Pell Grant Awards.

HMC did not accurately calculate Pell Grant disbursements for Students #22 and #24, which resulted in overpayments. Student #22 was overpaid by \$78 and Student #24 was overpaid by \$19.

**Required Action:** HMC must conduct a full file review of all students who received Pell Grant funds in the 2010-2011 and 2011-2012 award years to determine if the incorrect calculation of Pell grant funds resulted in overpayments to students. A spreadsheet listing the entire student population that received Pell Grants must be prepared, including the following information:

- 1.) Name
- 2.) Last four digits of SSN



- 3.) Award Year
- 4.) Program
- 5.) Pell amount awarded and disbursed
- 6.) Pell recalculated using correct methodology
- 7.) Note any change to Pell

Additionally, the institution must develop internal procedures to ensure that Pell Grants are correctly calculated. HMC must submit a copy of those procedures in response to this PRR. The overpayments noted above, totaling \$97, will be considered a liability owed by HMC to the Department. Instructions for repaying this liability will be provided in the FPRD.

NOTE: HMC has performed a full file review for 2010-2011 and 2011-2012 and provided completed spreadsheets to the Department. If there are liabilities due as a result of the full file review, instructions will be provided in the FPRD.

### **Finding #3: Incorrect DL Calculations**

**Citation:** Per 34 C.F. R. §685.301(a), a school participating in the Direct Loan Program shall ensure that any information it provides to the Secretary in connection with loan origination is complete and accurate. Additionally for loans originated under 34 C.F.R. § 685.301(a)(9)(i)(B), Except as provided in paragraph (a)(9)(ii) or (iii) of this section, at a school that measures academic progress in clock hours, or measures academic progress in credit hours but does not use a semester, trimester, or quarter system and does not have terms that are substantially equal in length with no term less than nine weeks in length, the lessor of-(1) The length of the student's program (or the remaining portion of that program if the student has less than the full program remaining) at the school; or (2) The academic year as defined by the school in accordance with 34 C.F.R 668.3.

**Noncompliance:** HMC's accreditor approved it to measure its programs using quarter credit hours. Julie Arthur, Institutional Improvement Specialist, conducted a new school visit of HMC April 20-21, 2011. During that onsite visit, Ms. Arthur advised HMC that it was incorrectly calculating its students' DL awards, because it was improperly using clock hours in its calculations. HMC was incorrectly converting its credit hours to clock hours and then using the clock hours in its DL calculations. Ms. Arthur informed HMC that it was required to correct its students' DL calculations using the non-term credit hour calculation formula.

During the off-site program review, the reviewers determined that HMC had failed to correct its DL calculations and that it had continued to incorrectly calculate its students' DL Awards.

HMC did not accurately calculate DL amounts for Students #6 and #8. This resulted in overpayments of DL. Student #6 was overpaid \$142.35 and Student #24 was overpaid \$142.35.

**Required Action:** HMC must conduct a full file review of all students who received Direct Loans in the 2010-2011 and 2011-2012 award years to determine if the incorrect calculation of DL amounts resulted in overpayments to students. A spreadsheet listing the entire student population that received DL must be prepared, including following information:

- 1.) Name
- 2.) Last four digits of SSN
- 3.) Award Year
- 4.) Program
- 5.) DL amount awarded and disbursed
- 6.) DL recalculated using correct methodology
- 7.) Note any change to Direct Loan

Additionally, the institution must develop internal procedures to ensure that Direct Loans are correctly calculated. HMC must submit a copy of those procedures in response to this PRR. The overpayments noted above, totaling \$284.70, will be considered a liability owed by HMC to the Department. Instructions on repaying this liability will be provided in the FPRD.

NOTE: HMC has performed a full file review for 2010-2011 and 2011-2012 and provided completed spreadsheets to the Department. If there are liabilities due as a result of the full file review instructions will be provided in the FPRD.

#### **D. Appendix**

Appendix A (Student Sample) contains personally identifiable information and will be emailed to CCI as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

## PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.